



Snohomish County
Planning and Development Services

Aaron Reardon
County Executive

Clay White, Director
3000 Rockefeller Avenue M/S #604
Everett, WA 98201-4046
(425) 388-3311 FAX (425) 388-3832

August 27, 2012

Dear Reader and Interested Citizen:

This letter is to notify you that on August 27, 2012, the Snohomish County Department of Planning and Development Services (PDS) issued ADDENDUM NO. 1 TO THE FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR FINAL DOCKET XIII AMENDMENTS TO THE GMA COMPREHENSIVE PLAN-PARAMOUNT OF WASHINGTON, LLC. This addendum has been prepared pursuant to WAC 197-11-625 and in response to a Growth Management Hearings Board Final Decision and Order dated April 25, 2011. No comment period is required for this addendum under WAC 197-11-502(8)(c).

This addendum provides additional environmental information on the anticipated environmental impacts from a proposed third non-project land use alternative associated with the BSRE Point Wells property, proposed *Ordinance No. 12-068* amending the Snohomish County Growth Management Act Comprehensive Plan, and proposed *Ordinance No. 12-069* amending *Snohomish County Code Chapter 30.31A SCC* and repealing *SCC 30.34A.085*. The additional environmental information contained in Addendum No. 1 does not significantly change the analysis of impacts and alternatives contained in previously issued environmental documentation for the Docket XIII-Paramount of Washington, LLC proposal. The analysis of the third non-project land use alternative results in no greater impacts than previously analyzed. Addendum No. 1 is not intended to satisfy individual project action SEPA requirements (the review needed for a future site-specific land use or building permit application).

This addendum is available online at www.snoco.org. In the search box, type in *Plans and Reports* and go to the *Environmental Documents* link. Copies of this addendum are available for review at the Planning and Development Services Department (PDS) office on the second floor in the Snohomish County Administration West Building, 3000 Rockefeller Ave., Everett, WA 98201. You may also contact PDS at 425-388-3311 to order copies. A nominal fee will be charged for copying.

Review of *Ordinance Nos. 12-068* and *12-069* will occur at a public hearing before the Snohomish County Council on September 19, 2012. The ordinances can be accessed through the County Council website at www.snoco.org/departments/council, by calling 425-388-3494, 1-800-562-4367 x3494, TDD 425-388-3700, or by email at contact.council@snoco.org. Written testimony is encouraged and may be sent to the County Council at the following address: Snohomish County Council, 3000 Rockefeller, MS 609, Everett, WA 98201. Testimony may be faxed to 425-388-3496 or sent via email to the above address.

If you have any questions concerning this addendum or the proposed amendments, please contact David Killingstad at 425-388-3311, ext. 2215 or at d.killingstad@snoco.org.

Sincerely,

Clay White, Director
Planning and Development Services

ADDENDUM NO. 1 TO THE FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR “FINAL DOCKET XIII AMENDMENTS TO THE GMA COMPREHENSIVE PLAN-PARAMOUNT OF WASHINGTON, LLC”

**Adopting of Future Land Use Map and Policy Amendments to the
Snohomish County GMA Comprehensive Plan, Amending the Zoning
Map to Implement Changes to the Future Land Use Map, and
Amending Title 30 SCC to Comply with a Final Decision and Order in
the Shoreline III-IV Growth Management Hearings Board Cases**

Prepared Consistent with

The Washington State Environmental Policy Act of 1971
Chapter 43.21C Revised Code of Washington
Chapter 197-11 Washington Administrative Code
Snohomish County Code Title 30



Snohomish County Planning and Development Services

Date of Issuance: August 27, 2012

Fact Sheet

Project Title:	Relating to the Growth Management Act (GMA), Adopting of Future Land Use Map and Policy Amendments to the Snohomish County GMA Comprehensive Plan, Amending the Zoning Map to Implement Changes to the Future Land Use Map, and Amending Title 30 SCC to Comply with A Final Decision and Order in the Shoreline III-IV Growth Management Hearings Board Cases.
Proposed Non-Project Action:	The proposed non-project action is the adoption by the Snohomish County Council of amendments to the Snohomish County General Policy Plan (GPP), Future Land Use Map, an areawide rezone and amendment to title 30 SCC.
Purpose of the EIS Addendum:	<p>This addendum adds information relating to the non-project programmatic county action described above. This information does not result in any new significant adverse environmental impacts and does not change the analysis of previously identified significant impacts of the alternatives to the county's GMACP within the previously issued SEPA documents dated January 2009, (Draft SEIS) and June 2009, (Final SEIS). This addendum also includes the analysis of a third alternative resulting in no greater impacts than previously analyzed.</p> <p>This addendum is being issued in accordance with WAC 197-11-625 and WAC 197-11-630. The adopted environmental documents listed herein, together with this addendum, meet Snohomish County's environmental review needs for the current proposed amendments.</p>
Description of Proposal:	Consider proposed amendments to the FLU map of the GPP to re-designate 61 acres of land at Point Wells from Urban Center (UC) to Urban Village (UV), amendments to the GPP Land Use chapter and Glossary, an areawide rezone from Urban Center (UC) to Planned Community Business (PCB) and amendments to title 30 SCC.
Location of Proposal:	Snohomish County
Action Sponsor Lead Agency:	Snohomish County Department of Planning and Development Services 3000 Rockefeller Avenue, M/S #604 Everett, Washington 98201-4066
Required Approval	Snohomish County Council – adoption of ordinances

Review: Washington State Department of Commerce – coordination of state comments.

Circulation and Comment: This addendum, or notice of availability, is being sent to all recipients of the previously issued Draft and Final SEIS for the Docket XIII-Paramount of Washington, LLC proposal as required by WAC 197-11-625. No comment period is required for this addendum under WAC 197-11-502(8)(c).

The proposed action is available by contacting: David Killingstad, Principal Planner
Snohomish County Planning and Development Services
3000 Rockefeller Ave., M/S #604
Everett, Washington 98201
Phone: (425) 388-3311, ext. 2215
E-Mail: d.killingstad@snoco.org

The proposed ordinances are available for viewing at the Planning and Technology Division of the Snohomish County Department of Planning and Development Services (County Administration Building West, 2nd Floor) and on the county's website. Visit www.snoco.org and type "Plans and Reports" in the search box and then select *Environmental Documents*.

Date of Issuance: August 27, 2012

Responsible Clay White, Director
Snohomish County Planning and Development Services
3000 Rockefeller Avenue, M/S #604
Everett, Washington 98201-4066

Signature


Clay White, Director

Environmental Review

Overview

The adoption of amendments to the GMA Comprehensive Plan, an areawide rezone and title 30 SCC are non-project actions under the Washington State Environmental Policy Act (SEPA). Addendum No. 1 is not intended to satisfy individual project action SEPA requirements (the review needed for a future site-specific land use or building permit application). Addendum No. 1 will be circulated in accordance with the procedures found in WAC 197-11-625.

Prior Environmental Review

The county published the SEIS for the Paramount of Washington, LLC proposal in 2009, in accordance with the annual comprehensive plan amendments (docket) required by the Growth Management Act (GMA). The Draft SEIS, issued in February 2009, presented two alternatives for the Point Wells property. The Final SEIS, issued in June 2009, identified and analyzed two alternatives for the Point Wells property: a no action alternative and an action alternative. The elements of the environment addressed in the SEIS document included elements of both the natural and built environment: earth, air, water, plants and animals, energy and natural resources, environmental health, population and employment, land and shoreline use, transportation, public services, and utilities.

EIS Addendum

According to the SEPA Rules, an Addendum to an EIS provides additional analysis and/or information about a proposal or alternatives where their significant environmental impacts have been disclosed and identified in a previous environmental document (WAC 197-11-600(3)(b)(ii)). An Addendum is appropriate when the impacts of the new proposal are the same general types as those identified in the prior document and when the new analysis does not substantially change the analysis of significant impacts and alternatives identified in the prior environmental documents (WAC 197-11-600(4)(e), WAC 197-11-706).

Addendum No. 1 is being issued pursuant to WAC 197-11-625 to meet the County's SEPA responsibility. It does not significantly change the analysis of impacts and alternatives contained in the Supplemental Environmental Impact Statement (SEIS) prepared in 2009 for the Docket XIII-Paramount of Washington, LLC proposal. Addendum No. 1 supplements the SEIS prepared in 2009 for the Docket XIII-Paramount of Washington, LLC and identifies the impacts for a third non-project land use alternative. The analysis of the third non-project land use alternative results in no greater impacts than previously analyzed. Revisions to the proposals may be considered during the public hearing process. To the extent that the existing environmental documents listed in this Addendum or other published documents have analyzed such revisions and adopted by reference; no additional programmatic action level environmental review will be required.

Distribution List

Federal Agencies

U.S. Natural Resource Conservation

U.S. Environmental Protection Agency

U.S. Fish and Wildlife Service

U.S. Army Corps of Engineers

National Marine Fisheries

U.S. Department of Agriculture, Forest Service

State Agencies

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WA State Energy Office

Office of Archaeology and Historical Preservation

Parks and Recreation Commission

Department of Transportation, Northwest Region

Recreation and Conservation Office

Regional Agencies and Interest Groups

Puget Sound Partnership

Puget Sound Clean Air Agency

Puget Sound Regional Council

Regional Transit Authority

Snohomish County Agencies and Interest Groups

Snohomish County Department of Public Works

Snohomish County Sheriff

Snohomish County Surface Water Management Div.

1000 Friends of Snohomish County

Action Council for Esperance

Agriculture Tomorrow

Arlington Heights Comm.

Canyon Firs Homeowners Assn.

Community Transit

Economic Development Council of Sno County

Edmonds Chamber of Commerce

Snohomish County Parks and Recreation Department

Snohomish County Solid Waste Division

Snohomish Health District

McKee's Evergreen Beach

North Creek Rural Areas

North Marysville Citizens

Picnic Point Community

Pilchuck Audubon Society

Possession Bay Association

Professional Consultants of Snohomish County

Silver Lake Action Comm.

Everett Chamber of Commerce
Everett Transit
Friends of Florence Acres
Futurewise
Housing Authority of Snohomish County
Jordan Road Citizens
Kayak Pt. Citizens Group
League of Women Voters
Little Bear Cr. Protective Assn.
Martha Lake Community Club
Martha Lake Homeowners
Master Builders Assoc. of King and Sno Co
Save Richmond Beach.org

Neighboring Planning Departments

Island County Planning Dept.
Skagit County Planning Dept.

Tribes

Muckleshoot Tribes
Sauk/Suiattle Tribe

Utilities

Alderwood Water District
Lake Stevens Sewer District
Olympic View Water and Sewer District
Silver Lake Water and Sewer
Snohomish County PUD No. 1
Highland Water Assn.
Seven Lakes Water Assn.
Sky Meadow Water Assn., Inc.

Smartgrowth Campaign
Snohomish Arlington Trail Coalition
Snohomish County Conservation District
Snohomish County/Camano Island Board of Realtors
Snohomish Wetlands Alliance
So. Sno. Co. Chamber of Commerce
Sound Transit
Stillaguamish Citizens Alliance
Swamp Creek Locust Way
Tom Ehrlichman
Wandering Creek Homes
Stillaguamish Flood Control District

Dept. of Dev. & Environ. Services (King Co.)
Chelan County Planning Dept.

Tulalip Tribes
Stillaguamish Tribe

Cross Valley Water District
METRO
Mukilteo Water District
Puget Sound Energy
Cascade Natural Gas
Roosevelt Water Assn.
Three Lakes Water Assn.
King County Wastewater Treatment Division

Cities

City of Arlington

City of Brier

City of Edmonds

City of Gold Bar

Town of Index

City of Lynnwood

City of Mill Creek

City of Mountlake Terrace

City of Shoreline

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Town of Woodway

City of Bothell

Town of Darrington

City of Everett

City of Granite Falls

City of Lake Stevens

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City of Monroe

City of Mukilteo

City of Snohomish

City of Sultan

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Edmonds School District #15

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Lake Stevens School District

Marysville School District

Mukilteo School District

Snohomish School District

Sultan School District

Darrington School District

Everett School District

Index School District

Lakewood School District

Monroe School District

Northshore School District

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Fire Districts & Ports

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Fire District 12 Marysville

Fire District 15 Tulalip

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Fire District 3 Monroe

Fire District 5 Sultan

Lake Stevens Fire Communications

Fire District 11 Silver Lakes

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Fire District 25 Oso
Fire District 27 Hat Island
Paine Field Fire District

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Monroe Monitor
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Mukilteo Beacon

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Fire District 24 Darrington
Fire District 26 Gold Bar
Port of Everett
Port of Edmonds

Lake Stevens Journal
Seattle Times-North Bureau
Mill Creek Enterprise
Woodinville Weekly
Enterprise Newspaper
The Edmonds Beacon

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ACRONYMS AND ABBREVIATIONS

BMP	best management practice
BSRE	BSRE Point Wells, LP
County	Snohomish County
CPPs	Countywide Planning Policies
DAHP	Washington State Department of Archaeology and Historic Preservation
Ecology	Washington State Department of Ecology
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
EFH	essential fish habitat
FLUM	Future Land Use Map
GHG	greenhouse gas
GMA	Growth Management Act
GMHB	Growth Management Hearings Board
HOV	high-occupancy vehicle
I-5	Interstate 5
ITE	Institute of Transportation Engineers
LOS	level of service
MLLW	mean lower low water
MTCA	Model Toxics Control Act
MUGA	Municipal Urban Growth Area
NMFS	National Marine Fisheries Service
NWI	National Wetlands Inventory
OHWM	ordinary high water mark
PSCAA	Puget Sound Clean Air Agency

PSE	Puget Sound Energy
PSRC	Puget Sound Regional Council
RCW	Revised Code of Washington
RWD	Ronald Wastewater District
SCC	Snohomish County Code
SEIS	Supplemental Environmental Impact Statement
SEPA	State Environmental Policy Act
SMA	Shoreline Management Act
SMMP	Shoreline Management Master Program
SMP	Shoreline Master Program
SR	State Route
ST2 Plan	Sound Transit 2 Plan
UC	Urban Center
UGA	Urban Growth Area
UI	Urban Industrial
USFWS	U.S. Fish and Wildlife Service
WDFW	Washington Department of Fish and Wildlife
WISAARD	Washington Information Systems for Architectural and Archaeological Records Data
WRIA	Water Resource Inventory Area
WSDOT	Washington State Department of Transportation
WUTC	Washington Utilities and Transportation Commission

1 Summary

1.1 Introduction and Purpose

Snohomish County (County) is reconsidering the previously adopted Final Docket XIII Comprehensive Plan Amendment and associated rezone that implements the amendment. The County has prepared this addendum to the 2009 Final Supplemental Environmental Impact Statement (SEIS) to meet specific requirements in a Growth Management Hearings Board (GMHB) Central Puget Sound Region Decision. This addendum analyzes an additional alternative called the Alternative Action, and updates the information presented in the Final SEIS and the Draft SEIS (ICF Jones & Stokes 2009a, 2009b). These documents supplement the EIS issued in 2005 for the 10-Year Update of the County's GMA Comprehensive Plan. This addendum also addresses the proposed policy change to the Growth Management Act (GMA) Comprehensive Plan but does not address any developer's plans. The analyses in the Draft SEIS, Final SEIS, and this addendum are not intended to satisfy SEPA requirements for an individual project action such as the review required for future land use and development. Additional detailed reviews of environmental impacts related to development proposals will occur as specific projects are proposed.

The Point Wells site, which is the subject of the policy and land use designation change in the 2009 docket proposal, is located in the southwest corner of the County adjacent to the City of Shoreline (Shoreline) and Town of Woodway (Woodway) (Figure 1-1). The site was transferred to BSRE Point Wells, LP (BSRE) in 2010. Currently, Paramount Petroleum Corporation uses the site as both a marine fuel transfer facility and asphalt distribution facility.

1.2 Summary of Environmental Effects for Transportation

The Alternative Action revises the number and types of housing units, the square footage and types of commercial uses, and the transportation assumptions associated with the development of an Urban Village on the Point Wells property. As part of this alternative, the intensity of development has been reduced compared to the level of development described in the Draft and Final SEISs for the 2009 Proposed Action.

With the Alternative Action, the mix of development would include approximately 1,800 housing units and 20,000 square feet of retail space. In addition, trip generation was estimated assuming 375 new jobs on the Point Wells site, and approximately 115,000 square feet of office space. This mix of development reduces the vehicle trips generated. Evaluating the Alternative Action complies with the GMHB requirements to meet the SEPA requirements for evaluating reasonable alternatives, and provides the County Council with information that analyzes an alternative with less intense development and traffic generated from the site.

The total net daily trips to and from the Point Wells site with the Alternative Action is projected to be 8,251; 4,363 fewer trips than the 2009 Proposed Action. Similarly, AM and PM peak hour trips to and from the Point Wells site would be lower with the Alternative Action compared to the 2009 Proposed Action.

The nine intersections projected to exceed LOS standards for the No Action Alternative (from the 2009 Final SEIS) are expected to degrade further for the Alternative Action. In addition, two intersections projected to meet standards for the No Action Alternative are expected to exceed standards for the Alternative Action:

- NW 195th Street and 15th Avenue NW – Shoreline, LOS F
- Richmond Beach Road and 8th Avenue NW – Shoreline, LOS F

Project-generated peak hour volumes generated by the Alternative Action are projected to exceed operational capacity on the 224th Street SW to N 185th Street segment of SR 99. In addition to nine road segments identified for the No Action Alternative that include intersections projected to exceed standards, the NW 195th Street/Richmond Beach Road: 20th Avenue NW to 8th Avenue NW segment includes intersections that exceed standards for the Alternative Action.

The 2009 Proposed Action is also expected to further degrade the nine intersections projected to exceed LOS standards for the No Action Alternative. In addition, four intersections projected to meet standards for the No Action Alternative are expected to exceed standards for the 2009 Proposed Action:

- NW 196th Street and 20th Avenue NW,
- NW 195th Street and 15th Avenue NW,
- Richmond Beach Road and 15th Avenue NW, and
- Richmond Beach Road and 8th Avenue NW.

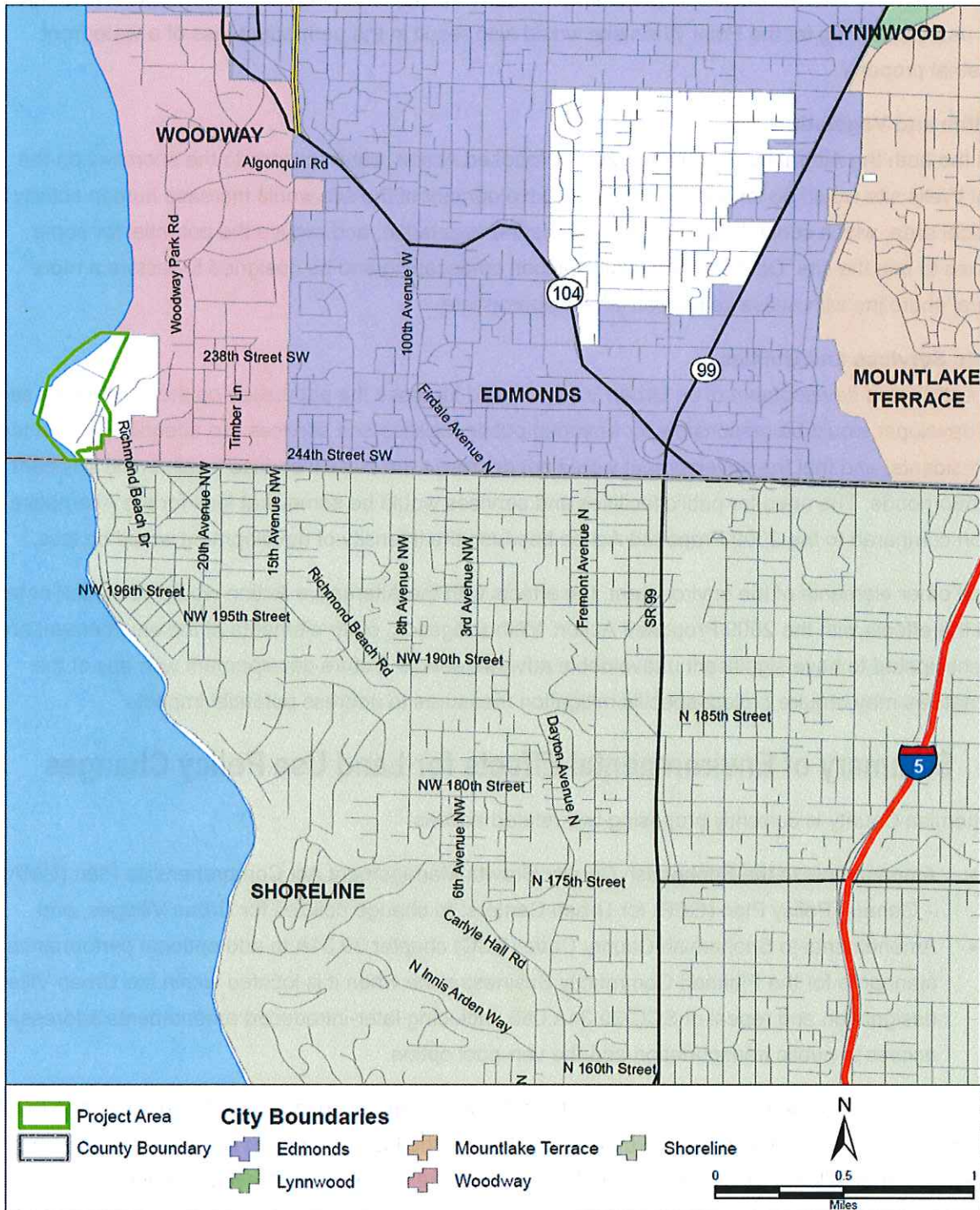
With the 2009 Proposed Action, site-generated PM peak hour volumes are projected to exceed operational capacity along the following roadway segments in the study area:

- Richmond Beach Drive: Woodway City Limits to NW 196th Street
- NW 196th Street: Richmond Beach Drive to NW 20th Avenue

In addition to the nine road segments identified for the No Action Alternative that include intersections projected to exceed standards, the following three segments include intersections that exceed standards with the 2009 Proposed Action:

- NW 196th Street: Richmond Beach Drive to NW 20th Avenue,
- NW 195th Street/Richmond Beach Road: 205th Avenue NW to 8th Avenue NW, and
- 20th Street NW/Timber Lane/238th Street SW: NW 196th Street to Woodway Park Road.

Figure 1-1.
Point Wells Vicinity Map



1.3 Summary of Other Environmental Effects

In addition to the transportation effects, development of an Urban Village with the Alternative Action has the potential to affect wildlife and vegetation, and public services and facilities. The proposed change in land use and zoning for the Point Wells site would also result in the permanent loss of a waterfront industrial property.

Wildlife and Vegetation

With the both the Alternative Action and 2009 Proposed Action, public access to the shoreline on the Point Wells site would no longer be restricted. Development of the site would increase human activity in the tidal area, which could disturb wildlife and marine vegetation, and reduce the potential for some species to use the site. Development would include landscaping and be designed to restore a more natural shoreline with native vegetation where appropriate.

Public Services and Utilities

The anticipated development of an Urban Village would increase the population on the Point Wells site. The developer would be responsible for ensuring public facilities and services are adequately provided to the residents, and that the development would not decrease the current service levels in the adjacent neighborhoods. The need for public facilities and services would be somewhat less for the Alternative Action compared to the 2009 Proposed Action because the intensity of development would be less.

For all other elements of the environment, the effects with the Alternative Action would be similar or less than the effects with the 2009 Proposed Action. With mitigation, other elements of the environment are not anticipated to have significant unavoidable adverse effects. Future development with any of the alternatives may require project-specific mitigation measures to address potential impacts.

1.4 Summary of Environmental Effects for Land Use Policy Changes

Snohomish County is currently proposing two related actions:

- Amendments to the Snohomish County Growth Management Act Comprehensive Plan (GMACP) – General Policy Plan (GPP) for Urban Centers; to change policies for Urban Villages, and
- Amendments to Snohomish County Code (SCC) chapter 30.31A to add optional performance standards for the Planned Community Business zone when it is located within the Urban Village designation and repeal of SCC 30.34A.085, including later-introduced amendments addressing access to public transportation and the van-pool option.

The revised proposal would re-designate the Point Wells site from Urban Center to Urban Village to allow more intense development on the site than allowed under the historical Urban Industrial designation, but less intense than allowed under the invalidated Urban Center designation. Development with the Urban Village designation would be similar to, but less intense than, the type of development allowed with the Urban Center designation that was proposed in the previous ordinances and 2009 Final SEIS. The zoning would also be changed to Planned Community Business.

Urban Villages are neighborhood scale clusters with a mix of high density residential, retail and office uses, and public and community facilities. Urban Centers are more concentrated developments where a substantial amount of population and employment growth can be located, providing a community-wide focal point and supported by increased transit use, bicycling, and walking.

Revising the General Policy Plan, along with the additional transportation analysis completed for the Alternative Action are part of meeting the GMHB's requirements to bring the County into compliance with the GMA.

2 Background

The County completed the Final EIS for the GMA Comprehensive Plan 10-Year Update in 2005. The Docket XIII Comprehensive Plan Amendment proposed to change the land use designation for the Point Wells site and to consider policy and text amendments to the land use chapter of the General Policy Plan. The proposed amendments to the County's Comprehensive Plan were initially analyzed in the Draft and Final SEIS documents published in 2009 (ICF Jones & Stokes 2009a, 2009b). The adoption of this docket proposal is classified under SEPA as a non-project action. The analysis in the Draft SEIS, Final SEIS, and this addendum is not intended to satisfy SEPA requirements for individual project actions, such as reviewing future land use or development permit applications. As specific projects are proposed, detailed reviews will be conducted of the potential environmental impacts. The analysis in these environmental documents is intended to meet the SEPA and GMA requirements for amending the County's Comprehensive Plan and development regulations, which are classified as non-project actions.

The docketing process is a procedure for receiving and evaluating citizen-initiated proposals to amend the County's Comprehensive Plan and/or development regulations. The Growth Management Act (GMA) requires counties and cities planning under the GMA to maintain such a procedure for citizens interested in suggesting changes to their GMA-based comprehensive plans. The GMA limits counties and cities to amend their comprehensive plans to not more than once per year with a few exceptions (Snohomish County 2011).

2.1 Growth Management Hearings Board Decision

On August 12, 2009, one month after issuing the Final SEIS, the County Council adopted Amended Ordinance Nos. 09-038 and 09-051 that amended the County's Comprehensive Plan to change the designation of Point Wells from Urban Industrial to Urban Center, rezoned the site from Heavy Industrial to Planned Community Business, and made certain policy and text amendments to the Land Use chapter of the General Policy Plan. Shoreline, Woodway, and Save Richmond Beach filed separate petitions in November 2009 challenging the County's amendments of its Comprehensive Plan and development regulations. These three petitions were consolidated as GMHB Case No. 09-3-0013c (*Shoreline III*).

On May 12, 2010, the County adopted Amended Ordinance Nos. 09-079 and 09-080 amending its development regulations for Urban Centers, creating a new Urban Center zone, and rezoning the Point Wells site to Urban Center. Shoreline, Woodway, and Save Richmond Beach again filed petitions appealing to the GMHB, which were consolidated as GMHB Case No. 10-3-0011c (*Shoreline IV*).

These cases were heard together in a hearing on the merits by the GMHB on March 2, 2011. The GMHB issued its Final Decision and Order for Coordinated Case Nos. 9-3-0013c and 10-3-0011c (*Shoreline III* and *Shoreline IV*) on April 25, 2011 (GMHB 2011). This order was superseded by the GMHB Corrected Final Decision and Order dated May 17, 2011. The GMHB entered a determination of invalidity for Ordinance Nos. 09-038 and 09-051. The GMHB remanded Ordinances 09-038, 09-051, 09-079 and 09-

080 to the County setting a one-year compliance schedule. Ordinances 09-038 and 09-051 did not meet GMA internal consistency requirements of RCW 36.70A.070 (preamble) and external consistency requirements of RCW 36.70A.100 (as concerns the City of Shoreline), and they were not guided by RCW 36.70A.020 Planning Goals 1, 3, and 12. The GMHB also found that SEPA review did not comply with the requirements of RCW 43.21C.030(c)(iii) pertaining to analysis of alternatives. The GMHB found that SEPA review for Ordinance Nos. 09-079 and 09-080 was deficient.

In a separate and independent action for declaratory and injunctive relief filed by Woodway and Save Richmond Beach, a King County Superior Court judge ruled on November 23, 2011, that Snohomish County could not process BSRE's application for an Urban Center until the County had taken action to comply with SEPA as set forth in the GMHB's decision (King County Superior Court 2011 and GMHB 2012).

The GMHB decision requires the County to consider the following:

1. Consistency of the proposal with RCW 36.70A.020 and GMA Planning Goals 1, 3, and 12.

RCW 36.70A.020 states:

The following goals are adopted to guide the development and adoption of comprehensive plans and development regulations of those counties and cities that are required or choose to plan under RCW 36.70A.040. The following goals are not listed in order of priority and shall be used exclusively for the purpose of guiding the development of comprehensive plans and development regulations:

(1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

(3) Transportation. Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.

(12) Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

2. Consistency with the RCW 36.70A.100 requirement for external consistency.

The comprehensive plan of each county or city that is adopted pursuant to RCW 36.70A.040 shall be coordinated with, and consistent with, the comprehensive plans adopted pursuant to RCW 36.70A.040 of other counties or cities with which the county or city has, in part, common borders or related regional issues.

The GMHB found that:

- Adoption of the referenced ordinances violates RCW 36.70A.100 by making Shoreline's Comprehensive Plan inconsistent with GMA requirements for capital facilities and transportation planning.
 - No transit service is currently provided or planned by transit agencies.
 - The water and sewer districts now serving the industrial uses on the property have not adopted plans for the infrastructure necessary to support a residential population of perhaps over 6,000.
 - Police, fire, emergency, trash collection, and other service vehicles all face the limitations of the single access road to the site. To support an Urban Center designation at Point Wells, Snohomish County needs to secure commitments from the agencies responsible for the necessary infrastructure and services; where applicable, service provision and facilities should be incorporated in the long-range plans of the responsible agencies.
3. Internal consistency with County policies. The GMHB found the Point Wells designation was inconsistent with the County Comprehensive Plan provisions concerning Urban Centers and was therefore non-compliant with the internal consistency requirements of RCW 36.70A.070 (preamble).

Policy LU 3.A.2

Urban Centers shall be compact (generally not more than 1.5 square miles), pedestrian-oriented areas within designated Urban Growth Areas with good access to higher frequency transit and urban services. Pedestrian orientation includes pedestrian circulation, pedestrian-scaled facilities, and pedestrian convenience. These locations are intended to develop and redevelop with a mix of residential, commercial, office, and public uses at higher densities, oriented to transit and designed for pedestrian circulation. Urban Centers should also include urban services and reflect high quality urban design. Urban Centers shall emphasize the public realm (open spaces, parks, and plazas) and create a sense of place (identity). Urban Centers will develop/redevelop over time and may develop in phases.

The GMHB found that:

- The proposal does not meet Policy LU 3.A.2's reference to "good access" and results in an urban center with limited transportation access. Such a center would not be located on a freeway/highway and a principal arterial, it would not be within 1/4 mile walking distance of a transit center or park-and-ride lot, and would have no access to higher frequency transit, although it would be located on a regional high-capacity transit route. Mere adjacency to an inaccessible transit corridor cannot satisfy the LU 3.A.2 Urban Center requirement for "good access to higher frequency transit."
- The proposal does not meet Policy LU 3.A.2's requirement "that transit usage and linkages are essential characteristics of Urban Centers."

- The proposal does not meet Policy LU-14 “Urban centers are areas where significant population and employment growth can be located, a community-wide focal point can be provided, and the increased use of transit, bicycling and walking can be supported. These centers are intended to be compact and centralized living, working, shopping and/or activity areas linked to each other by high capacity or local transit. The concept of centers is pedestrian and transit orientation with a focus on circulation, scale and convenience with a mix of uses.”
4. The GMHB concluded that the Ordinance 09-079 addressing the use of van-pools as a substitute for high-capacity transit and increasing the distance to transit from ¼ to ½ mile did not receive adequate SEPA analysis.

2.2 Regulations and Policies

Development in Snohomish County is guided by several federal, state, and county regulations, plans, and policies. These include the federal Endangered Species Act (ESA), State of Washington GMA, SEPA, State Shoreline Management Act, Countywide Planning Policies, Snohomish County GMA Comprehensive Plan and General Policy Plan, Snohomish County Title 30 Unified Development Code (UDC) , and the Snohomish County Shoreline Management Master Program.

2.2.1 Growth Management Act

The Washington State Legislature passed the GMA in 1990 and created three independent GMHBs to resolve land use disputes. In 2010, the three boards were consolidated into one. The GMA seeks to involve the public, cities, and counties in comprehensive land use planning so that unplanned and uncontrolled growth does not threaten the environment, economic development, or health and safety.

This addendum addresses the issues raised by the GMHB decision for SEPA EIS alternatives (Amended Ordinance No. 09-038), transportation (Amended Ordinance Nos. 09-051, 09-079, and 09-080), and GMA Goals 1, 3, and 12 in RCW 36.70A.020, as described in Section 2.1.

2.2.2 Snohomish County

County comprehensive plans and development regulations can be revised through a docketing process, ordinance amendments, and policy plan revisions as described below.

Docketing Process

The docketing process is a procedure for receiving and evaluating citizen-initiated proposals to amend the County's Comprehensive Plan and/or development regulations.

The GMA requires counties and cities planning under the GMA to maintain such a procedure for citizens interested in suggesting changes to their GMA-based comprehensive plans. The GMA limits counties and cities to amend their comprehensive plans to not more than once per year with a few exceptions (Snohomish County 2011).

In 2006, Paramount of Washington, LLC, now BSRE Point Wells LC, initiated the process to amend the County's Comprehensive Plan to change the future land use and zoning for the Point Wells site. The Snohomish County Council held public hearings to receive public testimony on the proposed amendments to the Comprehensive Plan for consideration on Final Docket XIII.

Comprehensive Plan, Zoning Code, and Zoning Map Amendments

The following ordinances were proposed prior to the GMHB ruling:

Amended Ordinance No. 09-038

On August 12, 2009, Amended Ordinance No. 09-038 proposed amendments to the Future Land Use Map in the County's Comprehensive Plan and amendments to the zoning map to implement changes to the Future Land Use Map for the Point Wells site. The ordinance proposed to redesignate the 61-acre site from Urban Industrial to Urban Center and rezone the area from Heavy Industrial to Planned Community Business.

Amended Ordinance No. 09-051

On August 12, 2009, Amended Ordinance No. 09-051 adopted the amendments to the Land Use chapter of the County's Comprehensive Plan - General Policy Plan for Urban Centers.

Amended Ordinance No. 09-079

On May 12, 2010, Amended Ordinance No. 09-079 adopted the Urban Center design standards and established a new zone for Urban Centers. This ordinance included the later-introduced amendments to SCC 30.34A.085 - Access to public transportation, which was an amendment to the version of the ordinance that was transmitted from the Planning Commission to the County Council. The later-introduced amendments to SCC 30.34A.085 revised the distance from buildings in an Urban Center to a transit stop from 0.25 to 0.5 mile and also included a van-pool option as an alternative to transit, which the GMHB found to be noncompliant with SEPA.

Amended Ordinance No. 09-080

On May 12, 2010, Amended Ordinance No. 09-080 adopted the zoning map amendments implementing the new zoning classification for the Urban Center comprehensive plan map designation at the Point Wells site.

In response to the GMHB ruling that remanded the above ordinances, the County is proposing two new ordinances that meets the GMHB requirements and comply with GMA.

New Ordinances

The Land Use chapter of the General Policy Plan in the County's Comprehensive Plan was updated to include the ordinances described above. However, all of the ordinances were remanded for the County to comply with the GMHB ruling.

Snohomish County is proposing two new ordinances for the Comprehensive Plan's General Policy Plan to amend the Centers section of the Land Use chapter to add new policies for Urban Villages, and amend

the Future Land Use Map to designate the Point Wells site as an Urban Village. The amendments to the County Code would amend Chapter 30.31A SCC by adding optional performance standards for Urban Villages under the Planned Community Business zone and repeal SCC 30.34A.085 in its entirety because that code section is no longer needed to implement the Urban Center zone. Thus, the GMHB's finding that the later-introduced amendments to proposed SCC 30.34A.085 (i.e., distance to public transit and van-pool option) were not analyzed under SEPA will become moot because of their repeal.

2.2.3 City of Shoreline

The County is coordinating its proposed Comprehensive Plan amendments to be consistent with Shoreline's comprehensive plan as directed by the GMHB and RCW 36.70A.100. The Shoreline Subarea Plan Policy PW-12 states (Shoreline 2012):

In view of the fact that Richmond Beach Drive between NW 199th Street and NW 205th Street is a local road with no opportunities for alternative access to dozens of homes in Shoreline and Woodway, the City designates this as a local street. Unless and until 1) Snohomish County and/or the owner of the Point Wells Urban Center can provide to the City the Transportation Corridor Study and Mitigation Plan called for in Policy PW-9, and 2) sources of financing for necessary mitigation are committed, the City should not consider reclassifying this road segment.

Shoreline conducted a Traffic and Safety Analysis for Point Wells in part because the City believed the background traffic estimates in the Draft SEIS were too high (Shoreline 2009). Shoreline's analysis used a 0.25 percent annual growth rate over existing conditions. The analysis evaluated traffic and safety impacts, as well as mitigation recommendations. As the basis for developing traffic mitigation, Shoreline proposed that a multimodal safety and corridor study be prepared. Information from the Shoreline analysis has been incorporated into the transportation analysis in Section 4.11 of this addendum.

2.3 Proposed Policy Changes

Snohomish County's updates to the Urban Village policies in the Comprehensive Plan, General Policy Plan's Land Use chapter include the following:

Objective LU 3.C – Plan for Urban Villages within unincorporated UGAs

- LU 3.C.1 – Urban Villages shall be planned as compact ((approximately three to 25 acres in size,)) pedestrian-oriented areas within designated Urban Growth Areas. Urban Villages are generally smaller than an Urban Center and provide an intermediate level of commercial or other services for an existing community, or take advantage of unique characteristics of an area that provide opportunities for higher intensity development with public benefits of open space or other public amenities. The development will include a variety of small-scale commercial and office uses, public buildings, high-density residential units, and public open space. Pedestrian orientation includes circulation, scale and convenience with connections between neighborhoods, communities and other centers. Urban Villages should also include urban services and reflect

high quality urban design. Urban Villages serve several neighborhoods within a radius of about two miles. Urban Villages will develop/redevelop over time and may develop in phases.

- LU 3.C.2 – Urban Villages shall be located where access to transportation facilities are available or can be improved based on the demands of the specific site and intensity of development and shall be designed to maximize use of nearby transit facilities. Locations may be on or adjacent to a minor arterial roadway, or within one-fourth mile of existing or planned access to local public transit service, or within one-half mile of a high capacity transit station.
- LU 3.C.5 – Urban Villages will be implemented through application of appropriate zoning classifications, provision of necessary services and public facilities (including transit, sewer, water, stormwater, roads and pedestrian improvements, parks, trails and open space) and protection of critical areas. The county will identify and apply methods to facilitate development within designated Urban Villages, including targeting of public facilities such as transit, parks and road improvements. Provision of needed public services provided by entities other than the county shall be incorporated in the Capital Facilities Plans of the service providers and may be planned and programmed in phases. Capital Facilities Plans shall provide for urban services needed at the time of development approval of specific phases of a project. The intensity of development may be tied to implementation of specific elements of Capital Facilities Plans including provision of roadway, transit, utility and public service facilities.
- LU 3.C.7 – The Urban Village at Point Wells will be developed to provide a location for high intensity residential development oriented to the amenities of Puget Sound with a mix of uses to serve the development and the surrounding neighborhoods. It will provide neighborhood-serving businesses and service providers. The Urban Village will provide public access to Puget Sound available to the larger regional population and provide for ecological restoration appropriate to the site. Uses proposed must be supported by adequate transportation facilities including local bus service or customized transit.

3 Description of Alternatives and Current Comprehensive Plan Amendment

The Draft and Final SEISs identified and analyzed two alternatives: the Proposed Action (referred to as 2009 Proposed Action in this addendum), and the No Action Alternative.

This addendum analyzes a third alternative, the Alternative Action. Snohomish County is proposing two new ordinances for the Comprehensive Plan's General Policy Plan. The ordinances would amend the Centers section of the Land Use chapter to add new policies for Urban Villages, and amend the Future Land Use Map to designate the Point Wells site as an Urban Village. The County would amend chapter 30.31A SCC to add optional performance standards for Urban Villages and repeal SCC 30.34A.085 addressing access to public transportation and the van-pool option. To assess potential impacts, the Alternative Action assesses a moderate development scenario that reduces the number of proposed housing units to 1,800, nearly a 50 percent reduction compared to the 2009 Proposed Action. The types of land use and housing, and the size of this development would also affect the number of vehicle trips generated. The Alternative Action examines ways to reduce vehicle trips and compares the transportation analysis to Shoreline's vehicle trip capacity limit as well as to the comprehensive transportation and capital facilities plan for streets providing access to Point Wells.

3.1 Description of Alternatives

3.1.1 No Action Alternative

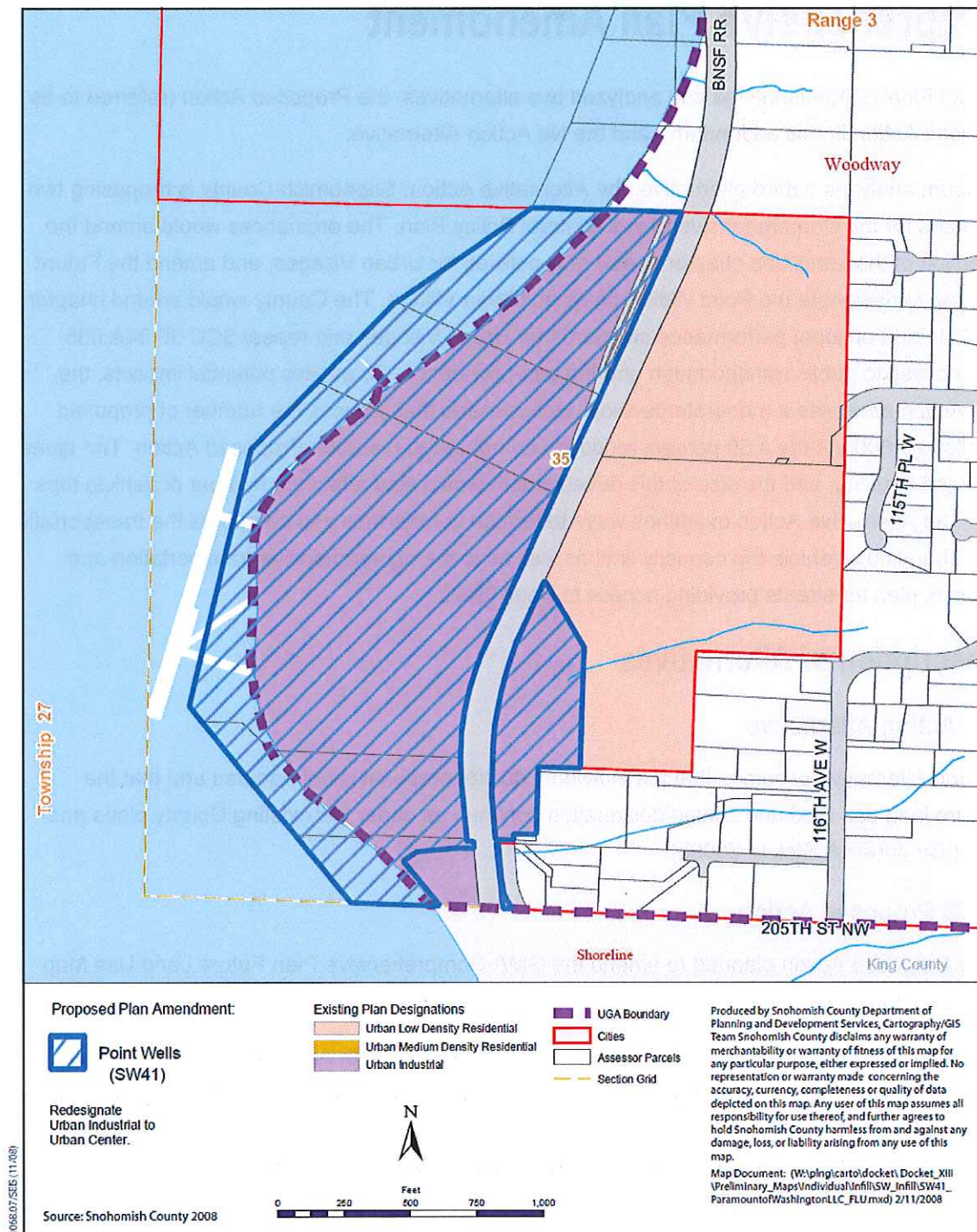
The No Action Alternative assumes that the individual docket proposal is not adopted and that the existing future land use map and zoning designation continue as under the existing County plans and regulations (ICF Jones & Stokes 2009b).

3.1.2 2009 Proposed Action

In 2009, the Proposed Action planned to amend the GMA Comprehensive Plan Future Land Use Map (Figure 3-1) and zoning map to:

- Intensify the Southwest UGA/Woodway Municipal Urban Growth Area (MUGA) by designating Urban Center (UC) instead of Urban Industrial (UI) on an approximate 61-acre site along Puget Sound.
- Provide consistency with the County's GMA Comprehensive Plan elements and policies.

Figure 3-1.
Future Land Use Map – Point Wells



To assess the impacts of the docket request in the 2009 Draft and Final EISs, the 2009 Proposed Action assumed a high development scenario that included:

- Thirty-three net acres of residential development with 3,500 housing units based on an assumption of 106 units per developable acre, and a population of 6,442 based on 2.0 persons per household;
- Thirty net acres of commercial development, with 802 employees;
- Continued compliance with the GMA and Countywide Planning Policies (CPPs);
- Allowing for a range of housing types affordable to different income levels; and
- Providing for employment growth proportionate to population growth (ICF Jones & Stokes 2009b).

The transportation analysis for the 2009 Proposed Action assumed 3,500 housing units would be developed, which captured the highest range of potential impacts generated by vehicle trips.

3.1.3 Alternative Action

The Alternative Action would amend the GMA Comprehensive Plan Future Land Use Map and zoning map. To assess the potential impacts of the comprehensive plan and policy changes for the Alternative Action, the intensity of the development has been adjusted. The mix of development used to assess impacts for the Alternative Action includes 1,800 housing units and 20,000 square feet of retail space. In addition, trip generation was based on 375 new jobs on the Point Wells site, which equates to approximately 115,000 square feet of office space. This moderate development scenario would reduce the number of vehicle trips generated compared to the 2009 Proposed Action.

The Alternative Action revises the transportation assumptions associated with the development of an Urban Village on the Point Wells property. These assumptions were used to examine the proposed policy changes initially analyzed in the Draft and Final SEISs with the Alternative Action specifically to provide decision makers with information to assist in evaluating the following:

- The effects on Shoreline's Comprehensive Plan policies for meeting transportation level of service goals and ensuring that Transportation Capital Facilities Plans are fully disclosed and available; and
- The implications for "good access to higher frequency transit and urban services" in terms of distance to transit services and use of van-pools.

3.2 Description of Current Comprehensive Plan Amendment

The County's adoption of the ordinance to amend Chapter 30.31A SCC, to repeal SCC 30.34A.085, and to revise the General Policy Plan's Land Use chapter for Centers (Urban Villages) is proposed to bring the County into compliance with the GMA. The County proposes to amend the designation of the Point Wells site on the Future Land Use Map from Urban Center to Urban Village, and amend the zoning map designation from Urban Center to Planned Community Business.